

FILED

2015 APR 15 P 3 15

CLERK US DISTRICT COURT
ALEXANDRIA, VIRGINIA

Exhibit 158

1 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

2 Do you hold meetings at Suite 377,
3 611 Pennsylvania --

4 A. No.

5 Q. -- Avenue Southeast?

6 Do you have a telephone there?

7 A. No.

8 Q. Do you have a -- other than a
9 mailbox, do you lease space there?

10 A. No.

11 Q. How long have you had this mailbox?

12 A. About as long as our first lawsuit
13 when we started getting death threats from who
14 we think are your clients.

15 Q. Okay. Your testimony is that you
16 believe that my client is -- has threatened you
17 with your own life as a result of this suit?

18 A. With harm and injury, certainly.

19 Q. With harm and injury, if not with
20 your life, okay.

21 Now, what's your basis for that
22 claim?

23 A. That people call and send materials
24 that -- that say that they've met with your
25 client, that -- or they represent your client,

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2 or they are your client, and that I especially
3 need to, you know, be very cautious about what
4 I do or say.

5 In one case, one person left a
6 message which we had on tape and produced to a
7 judge saying, take a look in the mirror. We
8 met with the Redskins today, and take a look in
9 the mirror, and if that's -- that's the last
10 time your face is ever going to look that way.

11 Q. Okay. So --

12 A. So these serious threats, and in that
13 case, a judge felt like the person was -- had a
14 hostile fixation and did enter a two- or
15 three-year, I can't remember which, restraining
16 order against that person.

17 Q. Okay. What was the name of the
18 person?

19 A. Michael Copperthite was that person.

20 Q. And when did this threat occur?

21 A. In the '90s and early 2000s.

22 Q. Well --

23 A. That's one that we know the name of.
24 There are lots of them. There are hundreds of
25 them, and we felt it was necessary because of

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2 the threats were so serious that we -- we just
3 took them at face value.

4 Q. Did you ever contact the Washington
5 Redskins about this?

6 You don't think you'd get cooperation
7 from the Washington Redskins if someone was --
8 claimed they were representing us and you got
9 threatened?

10 A. I think your clients encourage this
11 sort of thing and make it almost impossible for
12 anyone to go against them. I think you have,
13 just as you have paid fans, that you have
14 people who -- who do things like this or
15 encourage it.

16 Q. So you think --

17 A. No, I do not feel like I would have
18 gotten any help from your client.

19 Q. Okay. So when you say you think my
20 clients encouraged this sort of thing, you're
21 saying that you think my clients encourage
22 people to threaten you with your life?

23 A. I do.

24 Q. Okay. That's fine.

25 MR. RASKOPF: Mark this Exhibit 2.

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2 Q. You're not going to answer that?

3 A. There are too many questions there
4 for me to answer.

5 Q. Did you put the Morningstar Institute
6 on Google Plus?

7 A. No.

8 Q. Did someone operating on your behalf
9 put the Morningstar on Google Plus?

10 A. No.

11 Q. You just found your way onto Google
12 Plus? Is that your testimony?

13 A. I am not aware of this.

14 MR. GONDELMAN: Objection.

15 Objection.

16 BY MR. RASKOPF:

17 Q. So let's say that the location, the
18 precise location will not be part of this line
19 of questioning.

20 Where does the Morningstar Institute
21 operate from, without giving me the address?

22 A. Washington, D.C.

23 Q. Right. It's in your house, isn't it?

24 A. Yes.

25 Q. Okay. The offices of Morningstar

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2 Institute are in your office; right?

3 And you founded the Morningstar
4 Institute in 1984, did you not?

5 A. No, I didn't.

6 Q. Who founded the Morningstar
7 Institute?

8 A. Friends of my late husband's, in his
9 memory.

10 Q. And this was about 1984, was it not?

11 A. Yes.

12 Q. Has the Morningstar Institute since
13 1984 operated anywhere other than out of your
14 house?

15 A. No.

16 Q. Does the Morningstar Institute have
17 paid employees?

18 A. No.

19 Q. Does the Morningstar Institute have
20 sources of revenue to fund it other than what
21 you choose to fund Morningstar with?

22 A. Yes.

23 Q. Who funds Morningstar Institute?

24 A. Again I ask you why you didn't
25 subpoena Morningstar and why you didn't

NOTE: Corrected on by Harjo and Goodchman for accuracy of the Morning Star Institute, but it should be corrected throughout, as well as Morning Star.

NOTE: Same with Judge Kollar-Katelly's name with

1 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

2 NAME OF CASE: Pro-Football, Inc. v. Blackhorse

3 DATE OF DEPOSITION: December 23, 2014

4 1. To clarify the record.

5 2. To conform to the facts.

6 3. To correct transcription error.

Page 1 Line 17 Reason 3

From SUZAN HARJO to SUZAN SHAW HARJO

Page 2 Line 8 Reason 3

From SUZAN HARJO to SUZAN SHAW HARJO

Page 5 Line 17 Reason 3

From SUZAN to SUZAN

Page 26 Line 24 Reason 3

From Morningstar to Morning Star

Page 27 Line 4 Reason 3

From Morningstar to Morning Star

Page 28 Line 11 Reason 3

From Morningstar to Morning Star

Page 31 Line 25 Reason 3

From Morningstar to Morning Star

Page 40 Line 13 Reason 3

From Morningstar to Morning Star

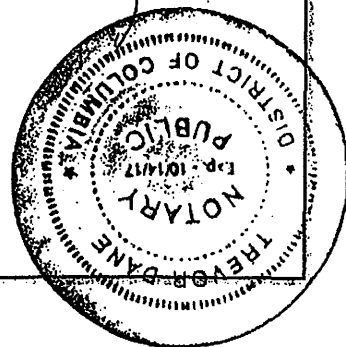
SUZAN HARJO

SUBSCRIBED AND SWORN TO BEFORE ME

THIS 07 DAY OF January, 2015.

(Notary Public)

My Commission expires: 10/14/2017



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7 Page 92 Line 24 Reason 1
 8 From Le Vaie to Le Valdo
 9 Page 95 Line 5 Reason 3
 10 From Romero, Federal to Romero, of the Federal

11 Page 102 Line 14 Reason 3
 12 From head to heads
 13 Page 116 Line 24 Reason 1
 14 From half Native American to "half Native American"

15 Page 130 Line 10 Reason 3
 16 From Morningstar to Morning Star
 17 Page 145 Line 24 Reason 3
 18 From tribe to Tribe

19 Page 64 Line 8 Reason 3
 20 From Kollar Kotelli's to Kollar-Kotelly's
 21 Page _____ Line _____ Reason _____
 22 From _____ to _____

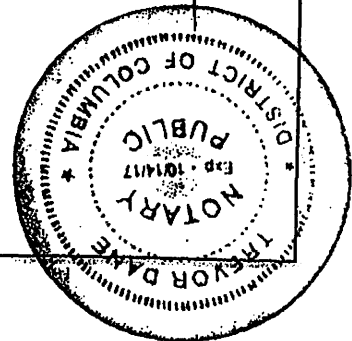
23 Suzan Harjo
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Page 40 Line 20 Reason 3

From Manningstar to Manning Star

Page 46 Line 19 Reason 3

From Manningstar to Manning Star

Page 75 Line 17 Reason 3

From Manningstar to Manning Star

Page 75 Line 25 Reason 3

From Manningstar to Manning Star

Page 82 Line 8 Reason 3

From Muskogee to Muscogee

Page 85 Line 25 Reason 3

From Muskogee to Muskogean

Page 89 Line 22 Reason 1

From Lavoia to LeValdo

Page 92 Line 14 Reason 1

From Lavoia to LeValdo

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